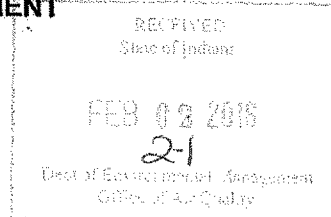


Tradebe Treatment and Recycling LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
 Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 CERTIFICATION**



Source Name: Tradebe Treatment and Recycling LLC
 Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: T 089-29424-00345

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☒ Report (specify) 2 throughput reports, Units 2r and 2s
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: Tita Lagrimas

Title/Position: Executive VP of Regulatory Affairs

Phone: 219.397.3951

Date: _____

Tradebe Treatment and Recycling LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
 Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

Quarterly Report

Source Name: Tradebe Treatment and Recycling LLC
 Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: T 089-29424-00345
 Facility: Unit 2R
 Parameter: Liquid Material Throughput
 Limit: The throughput to Unit 2R shall be less than 41,450,000 gallons of liquid material per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

QUARTER: 4th YEAR: 2015

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|----------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| October | 545,136. | 4,974,885. | 5,520,021. |
| November | 458,055. | 5,257,438. | 5,715,493. |
| December | 614,702. | 5,399,277. | 6,013,979. |

- ☒ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: Robert Vaughn
 Title / Position: EHS Manager
 Signature: _____
 Date: January 28, 2016
 Phone: 219.397.3951

Tradebe Treatment and Recycling LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
 Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

Quarterly Report

Source Name: Tradebe Treatment and Recycling LLC
 Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: T 089-29424-00345
 Facility: Unit 2S
 Parameter: Liquid Material Throughput
 Limit: The throughput to Unit 2S shall be less than 41,450,000 gallons of liquid material per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

QUARTER: 4th YEAR: 2015

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|----------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| October | 1,617,771. | 14,665,038. | 16,282,809. |
| November | 1,342,392. | 15,067,213. | 16,409,605. |
| December | 1,387,409. | 14,947,844. | 16,335,253. |

- ☒ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: Robert Vaughn
 Title / Position: EHS Manager
 Signature: _____
 Date: January 28, 2016
 Phone: 219.397.3561

Tradebe Treatment and Recycling LLC
East Chicago, Indiana
Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Tradebe Treatment and Recycling LLC
Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
Part 70 Permit No.: T 089-29424-00345

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☒ Report (specify) 2 quarterly reports VRU VOC Emissions, SDS and SDSII
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: Tita Lagrimas

Title/Position: Executive VP of Regulatory Affairs

Phone: 219.397.3951

Date: _____

Tradebe Treatment and Recycling LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
 Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

Quarterly Report

Source Name: Tradebe Treatment and Recycling LLC
 Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: T 089-29424-00345
 Facility: Vapor Recovery Unit (VRU) associated with SDS
 Parameter: VOC emissions (after control)
 Limit: VOC emissions (after control) from the Vapor Recovery Unit (VRU) shall not exceed 23.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall be determined using the equation contained in Condition D.1.10.

QUARTER: 4th YEAR: 2015

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|----------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| October | 2.366 | 18.645 | 21.011 |
| November | 2.128 | 19.351 | 21.479 |
| December | 1.640 | 19.486 | 21.126 |

- ☒ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: Robert Vaughn

Title / Position: EHS Manager

Signature: 

Date: January 28, 2016

Phone: 219.397.3951

Tradebe Treatment and Recycling LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
 Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

Quarterly Report

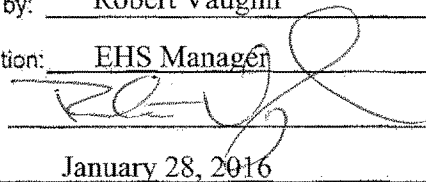
Source Name: Tradebe Treatment and Recycling LLC
 Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: T 089-29424-00345
 Facility: SDS II
 Parameter: VOC emissions (after control)
 Limit: VOC emissions after control from all the emission units associated with the SDS II shall be less than 95.6 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall be determined using the equation contained in Condition D.1.9.

QUARTER: 4th YEAR: 2015

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|----------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| October | 0.0 | 3.768 | 3.768 |
| November | 0.390 | 3.768 | 4.159 |
| December | 1.925 | 4.159 | 6.084 |

- ☒ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: Robert Vaughn
 Title / Position: EHS Manager
 Signature: 
 Date: January 28, 2016
 Phone: 219.397.3951

Tradebe Treatment and Recycling, LLC
East Chicago, Indiana
Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
Modified by: Heath Hartley

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATIONS AND COMPLIANCE MONITORING REPORT**

Source Name: Tradebe Treatment and Recycling, LLC
Source Address: 4343 Kennedy Avenue, East Chicago, Indiana 46312
Part 70 Permit No.: T 089-29424-00345

Months: October to December Year: 2015

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements under paragraph (a) of Section C – General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred in this reporting period.”

- ☐ NO DEVIATIONS OCCURRED DURING THIS REPORTING PERIOD
☒ THE FOLLOWING DEVIATIONS OCCURRED DURING THIS REPORTING PERIOD

Permit Requirement (specify permit condition #) A.2(a)(3)

Date of Deviation: October 1, 2015 **Duration of Deviation:** 92 days

Number of Deviations: 92

Probable Cause of Deviation: A.2(a)(3) states primary control is for Tanks 6/7 is flare. The flare is not being installed. Carbon canisters will be used to control the VOC emissions from these storage tanks.

Response Steps Taken: Verbal and written notification provided on 30 Oct 2015. Permit will be revised to reflect the actual VOC control being used on these storage tanks,

Tradebe Treatment and Recycling, LLC
 East Chicago, Indiana
 Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
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Permit Requirement (specify permit condition #) D.1.8

Date of Deviation: October 1, 2015

Duration of Deviation: 92 days

Number of Deviations: 92

Probable Cause of Deviation: D.1.8 states testing on flare pursuant to 40 CFR 60.18 will be performed within 180 days of issuance of the permit.

Response Steps Taken: Verbal notification on 13 Oct 2015 and written notifications on 30 Oct 2015, 22 Dec 2015, and 13 Jan 2016. Flare Performance Test conducted on 28 Jan 2016. Condition D.1.8 should be modified to require testing within 180 days after start-up of process unit SDS II to allow verification that Condition D.1.1(c) (i.e., Emission Offsets) is not an applicable requirement. Note that SDS II unit was shut down from 23 Aug 2015 to 24 Nov 2015.

Permit Requirement (specify permit condition #) D.2(c)

Date of Deviation: October 23, 2015

Duration of Deviation: 54 days

Number of Deviations: 54

Probable Cause of Deviation: Container throughput limitation increased. Container throughput limitation into Unit 4 (Area 5) exceeded A.2.C. (1) maximum capacity of 27,365 pack containers per year. Please note these throughputs include containers that are not opened and/or processed in Booth1.

Response Steps Taken: The amount of containers entering Unit 4: lab packing, depacking (an activity that does not include the opening of inner containers) and bulking operations, more commonly known as Area 5 Depack, for 2015 has been identified as 35,394 containers. The containers processed can range in volume from small bottles (i.e., 100 milliliters) on up to 30-gallon container. Of the 35,394 containers entering Unit 4, over fifty (50) percent have been identified as containers that were not processed (i.e., poured off) in any of the four booths. Booths 2, 3 and 4 are identified as insignificant activities.

The current permit identifies the capacity of Unit 4 as 27,375. This topic was briefly discussed during the booth 1 stack testing and Tradebe would like to discuss this with the IDEM prior to submittal of a modification request to revise Condition A.2(c) to reflect a volume or mass associated with Unit 4 activities.

Permit Requirement (specify permit condition #) D.1 (a) (4)

Date of Deviation: December 18, 2015

Duration of Deviation: 2 Days

Number of Deviations: 2

Probable Cause of Deviation: Blower for Tank 24 HP feed hopper carbon control system was not operating while processing hazardous waste material.

Response Steps Taken: On January 26, 2016 the operation blower for the Tank 24 HP feed hopper carbon control system was interlocked to the hydraulic system for processing material through the hopper so it is not possible to operate the hydraulic system without the blower being on. This will prevent future occurrences of this deviation.

Tradebe Treatment and Recycling, LLC
East Chicago, Indiana
Permit Reviewer: Heath Hartley

Significant Permit Modification No. 089-34503-00345
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Permit Requirement (specify permit condition #) _____

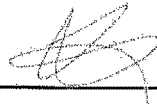
Date of Deviation: _____ **Duration of Deviation:** _____

Number of Deviations: _____

Probable Cause of Deviation: _____

Response Steps Taken: _____

Signature:



Form Completed by:

Tita LaGrimas

Title/Position:

Executive VP of Regulatory Affairs

Date:

January 29, 2016

Phone:

219-397-3951

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2

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PH: MSC: 00000000547
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